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06/17/2005 03:17 PM

To frank.piszkin@navy.mil
cc Richard Muza/R9/USEPA/US@EPA,
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bcc

Subject RE: comments on Group 2 PRLs

Andy,

We just need some clarifications here. What other reports were the sanitary sewer lines investigated? Did they receive NFA concurrence from the BCT team? The EBS does not say much about the investigation.

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>>> "Piszkin, Frank A CIV BRAC Dept, (EFDSW)" <frank.piszkin@navy.mil>
6/15/2005 4:30:35 PM >>>
Frank,

Our discussion below are intended to address both Comments #2 and #3:

The purpose of sampling for metals in drain material is to help ensure that materials going down the drains and p-traps hadn't accumulated in concentrations that would make them hazardous materials that could later be accidentally released to the environment during reuse of the building (e.g. during demolition or remodel). In addition, historically other bases have found mercury in some drain material at concentrations high enough to produce indoor mercury vapors that could be a concern. Therefore, the BCT took all this into consideration and as a result, Navy has sampled for metals in drains of buildings where metal-related materials were used to ensure that contaminated sediment would not be left in place within the building. This approach was agreed upon by the BCT during the development of the Final Environmental Baseline Survey (EBS) (September 2003).

Regarding releases to the environment from the sanitary sewer line, Section 4.1.5.2, page 4-28 of the Final EBS discusses the conclusion that the stationwide sanitary sewer system requires no further action for releases of hazardous substances (due to the collective past investigations of the sanitary sewer system, also discussed in the EBS).

However, the EBS also notes that the lateral lines from a number of PRL buildings would be investigated to check for releases from these buildings. Sampling for VOCs, SVOCs, and TPH beneath the lateral lines has been a typical approach for investigating potential lateral sewer releases at a number of PRLs. For PRL 51, the sampling results for these constituents did not indicate a release of contaminants from the lateral line associated with activities within that building. Therefore, it is highly unlikely that a similar release of metals would have occurred if no other releases were noted. That's especially the case knowing the limited Fate & Transport characteristics of metals verse the other indicators we sampled for (VOCs, SVOCs, and TPH).

Because metals tend to concentrate in drain material, and because this material could be exposed during reuse of a building, the Navy feels that sampling and the appropriate removal of drain material containing metals is appropriate. However, since soil samples beneath the lateral do not indicate any releases from the sewer line at PRL 51, and because the stationwide sanitary sewer system requires no further action as documented in the Final EBS, the Navy still believes that sampling only for VOCs, SVOCs, and/or TPH outside the building is warranted. These constituents are more indicative and the most appropriate for checking for a potential release.

Frank, sometimes I forget that these PRLs are just that, potential releases. These areas did not even make the initial cut years ago to be considered Locations of Concern. PRLs are being screened for any obvious signs of a release. PRL-51 isn't showing us any obvious sign that there was release.

Let us know if you need any additional clarifications.

v/r, Andy

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-----Original Message-----

From: Frank Cheng [mailto:FCheng@dtsc.ca.gov]
Sent: Tuesday, June 14, 2005 14:54
To: muza.richard@epa.gov; Arnold, Content P CIV BRAC, (EFDSW);
Piszkin,
Frank A CIV BRAC Dept, (EFDSW); jbroderic@rb8.swrcb.ca.gov
Subject: comments on Group 2 PRLs

We have the following comments:

PRL 51

1) Waste retrieved from the service sink in Bldg 51 was hazardous. The report recommends removing the material from the drain, and GSU concurs

with that recommendation.

2) The Navy should propose to investigate the sewer lines leading from this sink. The Navy should propose sampling in downstream locations likely to allow the accumulation of waste, and propose soil matrix sampling below any breaks, leaks, or discharge points where the sewer contents may have been released to the environment.

3) Three soil borings installed outside Bldg 51 were near a storm drain inlet, a grease trap, and between Bldg 51 and the probable course of the storm drain line, near the sanitary sewer. The soil matrix samples retrieved in these borings were analyzed for total petroleum hydrocarbons, VOCs and SVOCs. GSU does not regard this suite of analysis

as suitable to rule out contamination with hazardous metals. The Navy should propose additional sampling and analysis to rule out metals contamination at this PRL.

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